

February 3, 2003

**RE: Delta Faucet Company 031-16811-00007**

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

February 3, 2003

Mr. Larry Meyer  
Delta Faucet Company  
P. O. Box 47  
Greensburg, Indiana 47240

Re: 031-16811-00007  
Second Notice-Only Change to  
MSOP 031-11706-00007

Dear Mr. Meyer:

Delta Faucet Company, located at 1425 West Main Street, Greensburg, Indiana was issued a Minor Source Operating Permit (MSOP) on May 25, 2000 for a stationary chrome faucet electroplating source. A letter notifying the Office of Air Quality of a change in the permit was received on November 25, 2002. The source proposes to install one (1) natural gas-fired curing oven with a maximum heat input capacity of 0.8 million British thermal units per hour (mmBtu/hr).

The estimated UPTE for each applicable criteria pollutant is less than its respective 326 IAC 2-6.1-6(g)(4) levels and the combined HAP emissions are determined to be negligible.

Further, there are no federal or state rules that apply to the proposed oven and adding the proposed oven will not require any changes to the existing source permit requirements. The only change to the permit that is required is to incorporate the proposed curing oven additional descriptive information.

Therefore, the proposed curing oven shall be incorporated into the existing source Minor Source Operating Permit (MSOP) via a Notice Only Change pursuant to 326 IAC 2-6.1-6(d)(2) which states that minor administrative changes such as a change in the name, address, or telephone number of any person identified in a permit or a change in descriptive information concerning the source or emissions unit or units may be incorporated into the existing source MSOP via a Notice Only Change.

The following are the changes that will be made to the permit. Additional language is presented in bold type. All deleted information is struck-out.

**Condition A.2:**

Upon review of First Notice Only Change 031-15232-00007, issued on January 25, 2002, it was discovered that the curing oven added under the notice was incorporated under the original MSOP Condition A.2 description. Minor Permit Revision 031-12463, issued after the original MSOP added several units to the description of Condition A.2 that were inadvertently left out of the permit.

Therefore, the unit description of Condition A.2 shall be changed as follows to place the curing oven approved under notice only change 15232 in the Condition A.2 description of Minor Permit Revision 12463 and incorporate the new curing oven 3641.

A.2 Emissions units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

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- (~~tt~~**bb**) One (1) natural gas-fired drying oven, with a heat input capacity of 0.5 mmBtu/hr, capable of drying a maximum of 300 pounds of plastic parts per hour, in 1300 pounds of steel rack per hour, and exhausting at one (1) stack identified as 3559.
- (cc) One (1) 0.8 MMBtu/hr natural gas fired curing oven, identified as curing oven 3641, curing epoxy coating onto parts at a maximum rate of 40 pounds per hour, with emissions exhausted through Stack 3641.**

All conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
SDF

cc: File - Decatur County  
U.S. EPA, Region V  
Decatur County Health Department  
Air Compliance Section Inspector - D.J. Knotts  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**CONSTRUCTION PERMIT  
and MINOR SOURCE OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**Delta Faucet Company  
1425 West Main Street  
Greensburg, Indiana 47240**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, (326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 031-11706-00007	Date Issued: May 25, 2000
First Minor Permit Revision: 031-12463-00007	Date Issued: December 19, 2000
First Notice Only Change: 031-15232-00007	Date Issued: January 25, 2002
Second Notice Only Change: 031-16811-00007	Affected Page: 6
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 3, 2003

- (w) One (1) WWT sludge dryer, identified as 2209, equipped with a wet scrubber.
- (x) One (1) maintenance welding booth, identified as Booth 11-1, exhausting to stack 11-1, capacity: 0.2 pound of Oxyacetylene welding wire per hour.
- (y) One (1) tool room welding booth, exhausting to stack 1799, capacity: 0.2 pound of Oxyacetylene welding wire per hour.
- (z) Two (2) lab hoods.
- (aa) One (1) inductively coupled plasma (ICP) unit.
- (bb) One (1) natural gas-fired drying oven, with a heat input capacity of 0.5 mmBtu/hr, capable of drying a maximum of 300 pounds of plastic parts per hour, in 1300 pounds of steel rack per hour, and exhausting at one (1) stack identified as 3559.
- (cc) One (1) 0.8 MMBtu/hr natural gas fired curing oven, identified as curing oven 3641, curing epoxy coating onto parts at a maximum rate of 40 pounds per hour, with emissions exhausted through Stack 3641.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Notice Only Change to a Minor Source Operating Permit (MSOP)**

#### **Source Background and Description**

Source Name:	Delta Faucet Company
Source Location:	1425 West Main Street, Greensburg, Indiana 47240
County:	Decatur
SIC Code:	3432
Operation Permit No.:	031-11706-00007
Operation Permit Issuance Date:	May 25, 2000
Notice Only Change No.:	031-16811-00007
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from Delta Faucet Company relating to the operation of their existing stationary chrome faucet electroplating operation.

#### **Request**

On November 25, 2002, Delta Faucet Company submitted an application to install a new 0.8 MMBtu/hr natural gas fired curing oven, identified as Curing Oven 3641.

Adding the curing oven will not generate an increase in capacity or emissions from any existing emission units. Therefore, the emissions due to the proposed modification are the criteria and hazardous air pollutant (HAP) combustion emissions from the curing oven. The VOC and HAP unrestricted potential to emit (UPTE) from the material cured have already been accounted for in previous approvals.

The estimated UPTE for each applicable criteria pollutant is less than its respective 326 IAC 2-6.1-6(g)(4) levels and the combined HAP emissions are determined to be negligible.

Further, there are no federal or state rules that apply to the proposed oven and adding the proposed oven will not require any changes to the existing source permit requirements. The only change to the permit that is required is to incorporate the proposed curing oven additional descriptive information.

Therefore, the proposed curing oven shall be incorporated into the existing source Minor Source Operating Permit (MSOP) via a Notice Only Change pursuant to 326 IAC 2-6.1-6(d)(2) which states that minor administrative changes such as a change in the name, address, or telephone number of any person identified in a permit or a change in descriptive information concerning the source or emissions unit or units may be incorporated into the existing source MSOP via a Notice Only Change.

#### **Existing Approvals**

The source was issued MSOP 031-11706-00007 on May 25, 2000. The source has been operating under this permit, First Minor Permit Revision (031-12463-00007), issued on December 19, 2000, and First Notice Only Change (031-15232-00007), issued on January 25, 2002.

## Recommendation

The staff recommends to the Commissioner that the proposed Notice Only Change be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

## Emission Calculations

The proposed modification consists of the addition of one (1) additional 0.8 MMBtu/hr natural gas fired curing oven. The proposed oven will not generate an increase in the capacity or emissions from any existing equipment and the VOC and HAP emissions from the product cured have already been accounted for in previous approvals.

Therefore the emissions due to the proposed modification are the criteria and HAP pollutant combustion emissions generated by the proposed curing oven.

### 1. Unrestricted Potential to Emit (UPTE):

#### a. Criteria Pollutant Emissions:

The following calculations determine the curing oven criteria pollutant emissions based on natural gas combustion, a maximum capacity of 0.8 MMBtu/hr, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$$0.8 \text{ MMBtu/hr} * 8760 \text{ hr/yr} * 1 \text{ E6 Btu/MMBtu} * 1/1000 \text{ cf/Btu} * 1/1\text{E6 MMcf/cf} * \text{Ef lb poll/MMcf} * 1/2000 \text{ ton poll/lb poll} = \text{ton poll/yr}$$

	PM 7.6 lb/MMcf	PM10 7.6 lb/MMcf	SO2 0.6 lb/MMcf	NOx 100 lb/MMcf	VOC 5.5 lb/MMcf	CO 84 lb/MMcf
ton/yr	0.03	0.03	neg.	0.35	0.08	0.29

#### b. HAP Emissions:

The following calculations determine the curing oven HAP emissions based on natural gas combustion, a maximum capacity of 0.8 MMBtu/hr, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$$0.8 \text{ MMBtu/hr} * 8760 \text{ hr/yr} * 1 \text{ E6 Btu/MMBtu} * 1/1000 \text{ cf/Btu} * 1/1\text{E6 MMcf/cf} * \text{Ef lb poll/MMcf} * 1/2000 \text{ ton poll/lb poll} = \text{ton poll/yr}$$

Pollutant	Ef (lb/MMcf)	Emissions (tons/yr)
Benzene	2.1 E-3	7.35 E-6
Dichlorobenzene	1.2 E-3	4.21 E-6
Formaldehyde	7.5 E-2	2.63 E-4
Hexane	1.8	<b>0.01</b>
Toluene	3.4 E-3	1.19 E-5
Lead	5.0 E-4	1.75 E-6
Cadmium	1.1 E-3	3.85 E-6
Chromium	1.4 E-3	4.91 E-6
Manganese	3.8 E-4	1.33 E-6
Nickel	2.1 E-3	7.36 E-6
<b>Total</b>		<b>0.01</b>

## 2. Emissions After Controls:

All emissions are uncontrolled. Therefore, the emissions after controls equals the emissions before controls.

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a station-ary source to emit any air pollutant under its physical and operational design. Any physical or opera-tional limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.03
PM-10	0.03
SO <sub>2</sub>	neg.
VOC	0.08
CO	0.29
NO <sub>x</sub>	0.35

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Pollutant	Potential To Emit (tons/year)
Worst Case Single HAP	0.01
Total Combined HAPs	0.01



The estimated UPTE for each applicable criteria pollutant is less than its respective 326 IAC 2-6.1-6(g)(4) levels and the combined HAP emissions are determined to be negligible.

Further, there are no federal or state rules that apply to the proposed oven and adding the proposed oven will not require any changes to the existing source permit requirements. The only change to the permit that is required is to incorporate the proposed curing oven additional descriptive information.

Therefore, the proposed curing oven shall be incorporated into the existing source Minor Source Operating Permit (MSOP) via a Notice Only Change pursuant to 326 IAC 2-6.1-6(d)(2) which states that minor administrative changes such as a change in the name, address, or telephone number of any person identified in a permit or a change in descriptive information concerning the source or emissions unit or units may be incorporated into the existing source MSOP via a Notice Only Change.

### County Attainment Status

The source is located in Decatur County.

Pollutant	Status
PM <sub>10</sub>	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, the VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Decatur County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Decatur County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Existing Source Status

Existing Source Emissions (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited), as obtained from the Technical Support Document (TSD) of First Minor Permit Revision 031-12463-00007, issued on December 19, 2000:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	4.97	6.48	58.40	43.81	3.27	31.70	neg.	neg.

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The existing source is not a major PSD stationary source because the source criteria pollutant emissions are less than the major source level of 250 tons per year.
- (b) The existing source is not a Part 70 major source because the single and combined hazardous air pollutant (HAP) emissions are less than the respective levels of 10 and 25 tons per year and no criteria pollutant emissions exceed the applicable level of 100 tons/yr.

### Emissions Due to the Proposed Modification

Emissions due to the proposed modification based on emissions after controls and limitations, and 8760 hours of operation per year at rated capacity:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Proposed Changes	0.03	0.03	neg.	0.35	0.08	0.29	neg.	neg.

PSD Major Levels	250	250	250	250	250	250	-	-
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The emissions due to the modification are less than the applicable level of 250 tons per year. Therefore, the proposed modification is not a major PSD modification under 40 CFR 52.21 and 326 IAC 2-2.

### Source Emissions After the Proposed Modification

Emissions after the proposed modification based on emissions after controls and 8760 hours of operation per year at rated capacity:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Existing Source	4.97	6.48	58.40	43.81	3.27	31.70	neg.	neg.
Modification	0.03	0.03	neg.	0.35	0.08	0.29	neg.	neg.
Total	5.00	6.51	58.40	44.16	3.35	31.99	neg.	neg.

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	10/25

- (a) The source after the proposed modification is still not a major PSD stationary source because the source criteria pollutant emissions are still less than the major source level of 250 tons per year.

- (b) The source after the proposed modification is still not a Part 70 major stationary source because the single HAP, combined HAP, and VOC emissions are still less than their respective levels of 10, 25, and 100 tons per year.

### **Federal Rule Applicability**

#### **(a) New Source Performance Standards (NSPS)**

There are no New Source Performance Standards (326 IAC 12, 40 CFR Part 60) that apply to the proposed curing oven.

#### **(b) National Emission Standards for Hazardous Air Pollutants (NESHAP):**

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 20 and 40 CFR Parts 61 and 63) that apply to the proposed curing oven.

### **State Rule Applicability - Entire Source**

#### **(1) 326 IAC 1-6-3 (Preventive Maintenance Plan):**

The source is still required to have a Preventive Maintenance Plan (PMP) for all emission units and control devices of the source.

#### **(2) 326 IAC 2-2 (Prevention of Significant Deterioration):**

The emissions due to the modification are less than the applicable level of 250 tons per year. Therefore, the proposed modification is not a major PSD modification under 40 CFR 52.21 and 326 IAC 2-2.

#### **(3) 326 IAC 2-6 (Emission Reporting):**

This source is still not subject to the requirements of 326 IAC 2-6 because the source VOC and NOx emissions will still be less than the applicable level of 100 tons per year.

#### **(4) 326 IAC 5-1 (Opacity Limitations):**

The source is still subject to the requirements of 326 IAC 5.

#### **(5) 326 IAC 6-4 (Fugitive Dust Requirements):**

The 326 IAC 6-4 fugitive dust requirements still apply to the source.

### **State Rule Applicability - Individual Facilities**

There are no individual state rules that apply to the proposed curing oven.

### **Changes to the Permit**

The following changes will be made to the permit to incorporate proposed curing oven 3641 into the existing source MSOP. All additional language shall be presented in bold type. All deleted information is struck-out.

**1. Condition A.2:**

Upon review of First Notice Only Change 031-15232-00007, issued on January 25, 2002, it was discovered that the curing oven added under the notice was incorporated under the original MSOP Condition A.2 description. Minor Permit Revision 031-12463, issued after the original MSOP added several units to the description of Condition A.2 that were inadvertently left out of the permit.

Therefore, the unit description of Condition A.2 shall be changed as follows to place the curing oven approved under notice only change 15232 in the Condition A.2 description of Minor Permit Revision 12463 and incorporate the new curing oven 3641.

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

.....

~~(bb)~~ One (1) natural gas-fired drying oven, with a heat input capacity of 0.5 mmBtu/hr, capable of drying a maximum of 300 pounds of plastic parts per hour, in 1300 pounds of steel rack per hour, and exhausting at one (1) stack identified as 3559.

**(cc) One (1) 0.8 MMBtu/hr natural gas fired curing oven, identified as curing oven 3641, curing epoxy coating onto parts at a maximum rate of 40 pounds per hour, with emissions exhausted through Stack 3641.**

**2. Section D.2 Unit Description:**

The curing oven could be added into the unit description of Section D.2, but since there are no applicable requirements, new curing oven 3641 will not be added to unit description.

**Conclusion**

The owner or operator shall construct and operate the proposed curing oven according to the applicable requirements of the existing source MSOP, proposed Notice Only Change 031-16811-00007, and as applicable, all other approvals issued.